



October 11, 2022

**VIA ECF**

Honorable Sarah Netburn  
United States Magistrate Judge  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square Room 430  
New York, NY 1000

Re: *Lynne Freeman v. Tracy Deeks-Elkenaney et. al.* 22 Civ 2435 (AT)

Dear Judge Netburn:

We are attorneys for Plaintiff Lynne Freeman (“Plaintiff”) in the above-referenced action and are writing to you regarding your Order dated September 16, 2022, pertaining to the hearing that took place on September 15, 2022. Pursuant to that Order, the Court ordered, among other things, that the deadline for substantial completion of document discovery is October 14, 2022, and that Defendants shall propose search terms to Plaintiff’s counsel as soon as possible.

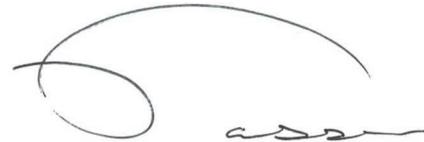
First, I believe that everyone has been acting diligently in an attempt to meet all of the deadlines. However, Defendants did not provide Plaintiff with a list of final search terms until September 27, which was 12 days after the hearing. Please note that, so as to avoid any further delays, Plaintiff did not ask for any changes to the search terms. However, that only left Plaintiff with 17 days to gather, review and produce documents, which was not enough time.

Accordingly, I requested yesterday from opposing counsel a one-week extension for all parties to and including October 21, 2022, to meet the deadline for substantial completion of document production. I told opposing counsel that I would still by October 14 identify with specificity which manuscripts were infringed and provide metadata to Defendants for those manuscripts. Opposing counsel for all parties agreed to the extension. Thus, we respectfully request that you grant the one-week extension.

11766 Wilshire Boulevard Suite 1470 Los Angeles, California 90025	PHONE (310) 861-2470 FAX (310) 861-2476 EMAIL <a href="mailto:mark@csrlawyers.com">mark@csrlawyers.com</a> WEBSITE <a href="http://www.markpassin.com">www.markpassin.com</a>
---	--

Respectfully submitted,

**CSReeder, PC**



---

Mark D. Passin  
11766 Wilshire Boulevard, Suite  
1470  
Los Angeles, CA 90025  
310-861-2475  
[mark@csrlawyers.com](mailto:mark@csrlawyers.com)

**REITLER KAILAS &  
ROSENBLATT LLP**

Paul V. LiCalsi  
885 Third Avenue, Ste 20th Floor  
New York, NY 10022  
212-209-3090  
[plicalsi@reitlerlaw.com](mailto:plicalsi@reitlerlaw.com)

*Attorneys for Plaintiff Lynne  
Freeman*

cc: All counsel of record (via ECF)

11766 Wilshire Boulevard Suite 1470 Los Angeles, California 90025	PHONE (310) 861-2470 FAX (310) 861-2476 EMAIL <a href="mailto:mark@csrlawyers.com">mark@csrlawyers.com</a> WEBSITE <a href="http://www.markpassin.com">www.markpassin.com</a>
---	--